

June 20, 2016

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Connect America Fund et al.*, WC Docket Nos. 10-90, 05-337, 14-58,
07-135, WT Docket No. 10-208, and CC Docket No. 01-92 –
Notice of Ex Parte Presentations

Dear Ms. Dortch:

On Thursday, June 16, 2016, Leonard Steinberg of Alaska Communications and outside counsel Richard Cameron and I met with the following individuals: Commissioner Pai, Nick Degani, Philippe Simard, Amy Bender, Claude Aiken, Travis Litman, Stephanie Weiner, Carol Matthey and Alex Minard. The enclosed slides summarize Alaska Communications' presentation in these meetings.

As a result of its discussion with the Wireline Competition Bureau, and based on further analysis of census block data, Alaska Communications now has a clearer understanding of how it may be able to meet the Commission's expectations for expanded broadband deployment in the Alaska Communications price cap study areas under Connect America Fund Phase II parameters. Therefore, in addition to the enclosed material, Alaska Communications hereby submits for the record in this proceeding the following:

Alaska Communications will commit to making broadband available at 10/1 Mbps to a prescribed number of unserved locations within census blocks identified by the Commission as eligible, not to exceed 26,000 required locations, provided that up to 25 percent of the required number of locations may be unserved locations in partially-served census blocks, and up to ten percent of the required number of locations may be unserved locations in census blocks with model-based costs below the high-cost threshold but adjacent to eligible high-cost census blocks. Alaska Communications respectfully requests that the first build-out milestone be set at 20 percent by year-end 2020.

Finally, Alaska Communications reiterates that the Commission faces a historical opportunity to substantially narrow the rural-rural divide in Alaska by closing the middle-mile gap that prevents remote communities from gaining effective access to affordable, reliable, high-

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June 20, 2015

Page 2 of 2

speed broadband service. Just as the Commission demands that price cap carriers provide a list of census blocks where they intend to deploy broadband, it should demand that CETCs in Alaska state by December 31, 2017 where they intend to deploy broadband and what middle-mile facilities they will build or lease in order to deliver broadband coverage meeting the FCC's minimum broadband standards. Reporting in advance of deployment, followed by annual reporting of facilities actually deployed, would significantly increase CETC accountability for the nearly \$1 billion targeted to their service areas under the ATA proposal. Further, the Commission should monitor broadband deployment based on the CETCs' annual reports, and indicate that the Commission is prepared to take action if at any time the CETCs do not appear to be deploying adequate facilities to deliver broadband meeting the minimum performance levels expected by the Commission. As recent filings from Alaska consumer groups show,¹ remote Alaskans are eager for advanced broadband capability and competitive choice among high-speed service providers. The Commission should seize this opportunity now.

Please direct any questions regarding this matter to me.

Very truly yours,



Karen Brinkmann

Counsel to Alaska Communications

Enclosure

cc:	Stephanie Weiner	Carol Matthey	Jim Schlichting
	Amy Bender	Alex Minard	Sue McNeil
	Nick Degani	Suzanne Yelen	Chris Helzer
	Claude Aiken	Heidi Lankau	Claire Wack
	Travis Litman	Talmage Cox	Peter Trachtenberg
			Matt Warner

¹ E.g., Letter from Angela Vanderpool, Executive Director, Chugachmiut, to Senators Murkowski, Sullivan, Representative Young (filed June 2, 2016); Letter from Cameron Poindexter, Manager, Bristol Bay Development Fund, to Senators Murkowski, Sullivan, Representative Young (filed May 18, 2016).